

**IN UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SALVADOR BELTRAN, JR., and
ELI GROSS, *Individually and on behalf of all
others similarly situated,*

Plaintiffs,

v.

SONY PICTURES ENTERTAINMENT,
INC., d/b/a CRUNCHYROLL

Defendant.

Case No: 1:22-cv-04858

Judge: Sara L. Ellis

JURY TRIAL REQUESTED

**JOINT MOTION FOR EXTENSION OF TIME
FOR SETTLEMENT APPROVAL SCHEDULE**

Defendant Sony Pictures Entertainment Inc. d/b/a Crunchyroll (“Defendant” or “Crunchyroll”) together with Plaintiffs Salvador Beltran, Jr., and Eli Gross (“Plaintiffs”) (together, the “Parties”) respectfully move jointly for an order: (1) extending the deadline by which Plaintiffs must move for preliminary approval of settlement until September 15, 2023; and (2) scheduling a preliminary approval hearing during the week of September 18, 2023, if the Court has availability.

1. Following multiple mediation sessions and arms’ length negotiations, the parties were able to reach a settlement agreement in principle. As part of those negotiations, the parties have engaged in informal discovery that has led to an increase in the putative class size.

2. In light of this discovery, Plaintiffs filed a Motion for Leave to File a Third Amended Complaint including additional claims and expanding the size of the putative class.

3. The Parties have conferred on this issue and Defendant does not oppose the filing of Plaintiffs’ proposed Third Amended Complaint.

4. On August 2, 2023, the parties submitted a Status Report in which they indicated an expectation to move for preliminary approval of the settlement in principle by August 23, 2023.

5. In light of the expanded scope of the proposed Third Amended Complaint, the Parties request that this Court extend the deadline to file a motion for preliminary approval of settlement until September 15, 2023.

6. Finally, the parties request that this Court calendar a hearing on the motion for preliminary approval during the week of September 18, 2023, if practicable.

WHEREFORE, Defendant Sony Pictures Entertainment Inc. d/b/a Crunchyroll and Plaintiffs Salvador Beltran, Jr., and Eli Gross respectfully request that this Court:

- (1) grant the Parties an extension of time, until September 15, 2023, to move for preliminary approval of settlement; and
- (2) schedule a preliminary approval hearing for the week of September 18, 2023, or at another time convenient for the Court; and
- (3) for such further relief the Court deems appropriate.

Dated: August 22, 2023

Respectfully submitted,

**SONY PICTURES ENTERTAINMENT
INC. d/b/a CRUNCHYROLL**

**SALVADOR BELTRAN, JR.
ELI GROSS**

By: /s/ William F. Farley

By: /s/ Brandon M. Wise

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